

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re Janet L. Harris
Vincent E. Harris

Case No. 17-35621-KRH
Chapter 13

Debtors

Address: 1304 Poco Dr. Richmond, VA 23235

SSN: xxx-xx- 9499 and 3082

NOTICE OF OBJECTION TO PROOF OF CLAIM

COMES NOW, Vincent E. Harris and Janet L. Harris, ("Debtors"), by counsel has filed an objection to your claim in this bankruptcy case.

Your claim may be reduced, modified, or eliminated. You should read these papers carefully and discuss them with your attorney if you have one.

If you do not want the court to eliminate or change your claim, then on or before June 16, 2021, you or your attorney must: (twenty-one days from the filing of the Motion).

File with the court, a written response to the objection, explaining your position at: the address of the bankruptcy clerk's office [pursuant to Local Bankruptcy Rule 9013-1(H)] within 21 days of the filing of this Motion at below address.

Clerk of Court
United States Bankruptcy Court
701 E. Broad Street, Room 4000
Richmond, VA 23219

You must also mail a copy to:
Joseph S. Massie, III, Esquire
115 N.1st Street- Suite 100
Richmond, VA 23219

Massie Law Firm, PC
Joseph Massie, III, Esquire (Bar No. 35472)
115 N. 1st Street, Suite 100
Richmond, VA 23219
(804) 644-4878 (T)
(804) 644-4874 (F)
jmassie@massielawfirm.com

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If you or your attorney do not take these steps, the court may decide that you do not oppose the objection to your claim.

May 26, 2021

/s/: Joseph S. Massie, III
Joseph S. Massie, III, Esquire
115 N.1st Street- Suite 100
Richmond, VA 23219
(804) 644-4878 (T)
(804) 644-4874 (F)

WHEREFORE, Debtors request that the Court sustain the objection.

May 26, 2021,

RESPECTFULLY SUBMITTED
Vincent E. Harris
Janet L. Harris

/s/: Joseph S. Massie, III
Joseph S. Massie, III, Esquire
115 N.1st Street- Suite 100
Richmond, VA 23219
(804) 644-4878 (T)
(804) 644-4874 (F)

CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2021, by first class mail an exact copy of the foregoing Objection to Proof of Claim to Toyota Motor Credit Corporation c/o: Beckett and Lee, LLP, PO Box 3001 Malvern, PA 19355-0701

May 26, 2021

RESPECTFULLY SUBMITTED

Vincent E. Harris
Janet L. Harris

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By: /s/: Joseph Massie, III

Joseph Massie, III

Debtor

Vincent E. Harris
1304 Polo Drive
Richmond, Virginia 23235

Joint Debtor

Janet L. Harris
1304 Polo Drive
Richmond, Virginia 23235

Toyota Motor Credit Corporation
c/o: Beckett & Lee Law Firm, LLP
PO Box 3001
Malvern, PA 19355-0701

Trustee

Suzanne Wade
PO Box 1780
Richmond, VA 23230

U.S. Trustee

Judy A. Robbins
Office of the U.S. Trustee- Region 4-R
701 E. Broad Street, Suite 4304

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OBJECTION TO PROOF OF CLAIM

COMES NOW, Vincent E. Harris and Janet L. Harris, (“Debtors”), by counsel,
and pursuant to 11 U.S.C. Rule 3007, Objection to Claim(s), Debtor’s object to claim number
3 by Toyota Motor Credit Corporation.

1. Debtors filed for protection under Chapter 13 of U.S.C. Bankruptcy Code
November 10, 2017.
2. On December 11, 2017, Toyota Motor Credit Corporation , filed secured
claim number 3.
3. On December 12, 2018, Toyota Motor Credit Corporation amended the
claim to \$5,939.25, five thousand nine hundred thirty-nine dollars and twenty-
five cents.
4. Debtors object to claim number 3, as they believe that Toyota Motor Credit
Corporation, had been more diligent in selling the vehicle the deficiency
balance would have been significantly lower.
5. The Debtors are requesting that claim number 3 be amended to \$1,000.00,
two thousand and five hundred dollars and zero cents as this is a fairer and

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more appropriate price.

WHEREFORE, Debtors request that the Court sustain the objection.

May 26, 2021,

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By: /s/: Joseph S. Massie, III
Joseph S. Massie, III, Esquire
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Richmond, Virginia 23219-2125
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May 26, 2021

RESPECTFULLY SUBMITTED

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Joint Debtor

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Toyota Motor Credit Corporation
c/o: Beckett & Lee Law Firm, LLP
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Trustee

Suzanne Wade
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U.S. Trustee

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